

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

24-CR-59-RJA-JJM

HADI MATAR,

Defendant.

**MOTION TO EXTEND DEADLINE FOR DEFENDANT TO
FILE PRETRIAL MOTIONS**

THE UNITED STATES OF AMERICA, by and through its attorney, Michael DiGiacomo, United States Attorney for the Western District of New York, Timothy C. Lynch and Charles M. Kruly, Assistant United States Attorneys, of counsel, hereby requests, on behalf of defense counsel, Nathaniel “Ned” Barone, who is suffering from a serious medical condition, a 30-day adjournment of the April 7, 2025 deadline to file the defendant’s pretrial motions in this matter.

On April 8, 2025, Andrew Brautigam, who works with Ned Barone at the Chautauqua County Public Defender’s Office, advised government counsel and the Court that Mr. Barone is undergoing an emergency medical procedure today, and therefore, was unable to file motions by the April 7, 2025 deadline. Mr. Brautigam has not entered an appearance in this matter yet, so he is unable to timely file the motion for an extension of time. As such, the government is making the motion at the request of defense counsel.

DATED: Buffalo, New York, April 8, 2025.

MICHAEL DIGIACOMO
United States Attorney

BY: s/TIMOTHY C. LYNCH
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